



South Coast Air Quality Management District

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FAXED: APRIL 22, 2005

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Mr. Glen Worthington
Community Development Department
City of Irvine
P. O. Box 19575
Irvine, CA 92623-9575

**Draft Environmental Impact Report (DEIR) for
Planning Areas 1, 2 & 9, GPA/ZC: Irvine**

Dear Mr. Worthington:

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:CB

ORC050316-14
Control Number

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1. **Diesel Particulate Filters:** The lead agency indicates on page 5.3-27 of the DEIR that due to the limited availability of construction equipment retrofitted with diesel particulate filters, this mitigation measure is infeasible and therefore would not be considered for implementation. Rather than simply reject this mitigation measure, the lead agency should require the project proponent to investigate the availability of construction equipment retrofitted with particulate filters and give preference to contractors with relatively modern construction equipment that are or could be retrofitted with diesel particulate filters.
2. **Mitigation Measures:** Given that project emissions far exceed the significance thresholds, it is recommended that in addition to the mitigation measures proposed by the lead agency, the lead agency consider the following measures for implementation where feasible:
 - Trucks hauling dirt, sand, gravel or soil are to be covered or should maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
 - Use light-colored roofing materials in construction to deflect heat away from buildings.
 - Use double-paned windows to reduce thermal loss in buildings.
 - Install solar panels on roofs to supply electricity for heating and cooling systems for schools and large commercial buildings.
 - Install automatic lighting on/off controls and energy-efficient lighting.
 - Landscape with appropriate drought-tolerant species to reduce water consumption.
3. **Editorial Comment:** On page 5.3-13 of the DEIR, the lead agency states that Appendix G of the CEQA Guidelines outlines the thresholds for determining significance for "Noise". This typographical error should be corrected to "Air Quality".